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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

**IN RE: FIGHT PASS AUTO-RENEWAL
LITIGATION**

THIS DOCUMENT RELATES TO: ALL ACTIONS.

Case No. 2:23-cv-00802-CDS-DJA

Member Case Nos.: 2:23-cv-01211-CDS-EJY
2:23-cv-01259-CDS-EJY

**SUPPLEMENTAL
DECLARATION OF CHAD
SAUNDERS IN SUPPORT OF
PLAINTIFFS' UNOPPOSED
MOTION FOR FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT**

1 I, Chad Saunders, declare as follows:

2 1. I submit this declaration to supplement my firm's previous declaration
3 submitted in support of Plaintiffs' Motion for Attorneys' Fees and Costs. See
4 Declaration of Craig Straub filed April 22, 2025 (ECF 106-2).

5 2. My firm has or will incur the following additional out-of-pocket costs and
6 expenditures in relation to my appearance in the District of Nevada for the June 10, 2025
7 hearing on Plaintiffs' Motion for Final Approval of Settlement:

8 \$556.96 – airfare

9 \$127.69 – hotel

10 \$150 estimated expenditures for transportation, parking, meals, and other incidental
11 costs.

12 \$ 834.65 Total

13 3. The above amounts are reasonable and were expended in furtherance of
14 securing the relief for the class in this matter.

15 4. I ask that the above total be considered for cost reimbursement from the
16 Gross Settlement Fund pursuant to Paragraph 4.1 of the Settlement Agreement and
17 Release, in addition to the amounts previously reported in my firm's April 22, 2025
18 declaration.

19
20 Executed this 6st day of June, 2025 at Berkeley, California.

21
22 /s/ Chad Saunders

23 Chad Saunders
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